

HEARING DATE AND TIME: May 27, 2010 at 9:45 a.m. (Eastern Time)

OBJECTION DEADLINE: May 20, 2010 at 4:00 p.m. (Eastern Time)

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of Unsecured Creditors Holding Asbestos-Related Claims*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:
f/k/a General Motors Corp., <i>et al.</i>	:
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Chapter 11 Case No.  
09-50026 (REG)  
(Jointly Administered)

**SUPPLEMENTAL AND CORRECTED RESPONSE OF THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS HOLDING ASBESTOS-RELATED CLAIMS TO  
THIRD MOTION OF DEBTORS' FOR ENTRY OF ORDER PURSUANT TO 11 U.S.C.  
§ 1121(d) EXTENDING PERIODS IN WHICH DEBTORS MAY FILE CHAPTER 11  
PLAN AND SOLICIT ACCEPTANCES THEREOF**

The Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the “**Asbestos Claimants Committee**” or “**ACC**”), by its undersigned counsel, submits this supplemental and corrected response to the Debtors’ motion for a third extension of the periods during which the Debtors enjoy the exclusive right to propose a plan of liquidation and solicit acceptances from creditors (the “**Motion**”) and respectfully states as follows:

1. On May 20, 2010, the ACC filed its response to the Motion [D.I. No. 5815]. The ACC therein stated that it does not oppose the Motion, but that the “the formulation and confirmation of a liquidation plan depend upon, among other things, the conclusion of an asbestos claims estimation process that is only now beginning. That process can progress expeditiously only after the Debtors complete the production of relevant data.” Response ¶ 2.

2. The ACC also stated in its Response that although its claims consultant had received access to the Debtors’ database of prepetition claims, the ACC had “not yet received the data compiled by the Debtors with respect to asbestos claims filed during these cases pursuant to the bar date order.” Response ¶ 4. We have since learned that the latter statement was incorrect in this respect: The Debtors’ data regarding asbestos claims filed during these cases was provided to the ACC’s consultant on May 15, 2010.

3. It remains the ACC’s position that the Motion should be granted, reserving the rights of all parties with respect to any subsequent motion to extend or terminate exclusivity.

Dated: May 24, 2010

Respectfully submitted,

CAPLIN & DRYSDALE, CHARTERED

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